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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SANTOSH BHARDWAJ,

Plaintiff,

-against-

**PRABHU DAYAL, CHANDINI DAYAL, and
AKANSHA DAYAL,**

Defendants.

No. 11 Civ. 4170 (AKH)

**DECLARATION OF DANA SUSSMAN IN SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS**

I, Dana Sussman, declare as follows:

1. I am an associate at the firm of Outten & Golden LLP in New York, New York, which, together with The Legal Aid Society of New York, are Plaintiff's Counsel herein. I make this Declaration in support of Plaintiff's Opposition to Defendants' Motion to Dismiss.

Exhibits

2. Attached as **Exhibit A** is a true and correct copy of an excerpt of United States Department of State's Diplomatic List, revised April 2011, available at <http://www.state.gov/documents/organization/162842.pdf> and last visited on September 22, 2011.

3. Attached as **Exhibit B** is a true and correct copy of the webpage for the United States Department of State titled "Foreign Embassy Information & Publications," available at <http://www.state.gov/s/cpr/rls/index.htm> and last visited on September 22, 2011.

4. Attached as **Exhibit C** is a true and correct copy of the webpage for the United States Department of State titled "Diplomatic List," available at <http://www.state.gov/s/cpr/rls/dpl/index.htm> and last visited on September 22, 2011.

5. Attached as **Exhibit D** is a true and correct copy of an excerpt of the United States Department of State's publication titled "Foreign Consular Offices in the United States," revised May 24, 2011, available at <http://www.state.gov/documents/organization/164400.pdf> and last visited on September 22, 2011.

I declare under penalties of perjury under the laws of New York and the United States that the foregoing is true and correct.

Dated: September 22, 2011
New York, New York

Respectfully submitted,

OUTTEN & GOLDEN LLP

By:

/s/ Dana Sussman
Dana Sussman

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